

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA) CRIMINAL NO. 1:CR-01-131-01
)
 v.) (Judge Rambo)
)
SYNEDO MICHAEL WILLIAMS) (ELECTRONICALLY FILED)

UNOPPOSED MOTION TO EXTEND PRE-SENTENCE
INVESTIGATION REPORT DISCLOSURE DATE

AND NOW, comes the government through Christy H. Fawcett, Assistant U.S. Attorney, and files the within Unopposed Motion to Extend Pre-Sentence Report Disclosure Date:

1. The defendant pleaded guilty on August 9, 2006.
2. The pre-sentence investigation report is due to be disclosed to the parties on December 4, 2006.
3. Because the case involves numerous victims, complete information concerning victims and restitution cannot be acquired by the pre-sentence report disclosure date. The government previously asked for an extension of the pre-sentence disclosure date in the hope that the information could be obtained prior to December 4, 2006. This hope proved to be impractical.
4. The government now hopes that such information can be acquired within 60 days of December 4, 2006.
5. The government has communicated with Terrence McGowan, Esquire, who has indicated he does not oppose the government's motion.

WHEREFORE, the government requests the Court to enter an order extending the date for disclosure of the pre-sentence investigation report for 60 days.

Respectfully submitted,

THOMAS A. MARINO
United States Attorney

s/Christy H. Fawcett
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That this 21st day of November 2006, she served a copy of the attached

UNOPPOSED MOTION TO EXTEND PRE-SENTENCE
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by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

Terrance J. McGowen, Esquire
Killian & Gephart, LLP
218 Pine Street
P.O. Box 886
Harrisburg, PA 17108-0886

s/Christina L. Garber
CHRISTINA L. GARBER
Legal Assistant